

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

APRIL DARRIN, *et al.*, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

HUNTINGTON INGALLS INDUSTRIES,

Defendant.

Case No. 4:23-cv-00053-JKW-DEM

District Judge Jamar K. Walker

Magistrate Judge Douglas E. Miller

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS TO PLAINTIFFS**

Pursuant to Fed. R. Civ. P. 23(h) and Fed. R. Civ. P. 54(d)(2), as well as this Court's March 15, 2024 Order Granting Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 50), Plaintiffs, through Class Counsel, respectfully bring this Motion to the Court for an order awarding attorneys' fees, reimbursement of expenses, and a service award to Plaintiffs April Darrin, Kenneth D. Keeler, Cheryl Soles, Tyler N. Beadle, and Bruce Snyder.

This Motion is supported by the Memorandum in Support of Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Award to Plaintiffs; the Declaration of Raina C. Borrelli in Support of Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Award to Plaintiffs, and attached exhibits, and all files, records, and proceedings in this matter.

Plaintiffs intend to file a proposed Order regarding Plaintiffs' Motion for an Award of Attorneys' Fees, Reimbursement of Expenses, and Service Award in the forthcoming filing pertaining to Plaintiffs' Motion for Final Approval of Class Action Settlement.

Dated: June 7, 2024

Respectfully submitted,

By: /s/ David Hilton Wise
David Hilton Wise, VA Bar No. 30828
WISE LAW FIRM PLC
10640 Page Avenue, Suite 320
Fairfax, Virginia 22030
Telephone: 703-934-6377
dwise@wiselaw.pro

Raina Borrelli (*pro hac vice*)
STRAUSS BORRELLI PLLC
One Magnificent Mile
980 N. Michigan Avenue, Suite 1610
Telephone: (872) 263-1100
raina@straussborrelli.com

Scott Edward Cole, Esq. (CA S.B. #160744)
COLE & VAN NOTE
555 12th Street, Suite 2100
Oakland, CA 94607
Telephone: (510) 891-9800
sec@colevannote.com

Gary E. Mason
MASON LLP
5335 Wisconsin Avenue NW, Suite 640
Washington, DC 20015
Telephone: (202) 429-2290
gmason@masonllp.com

Plaintiffs' Interim Co-Lead Class Counsel

Kenneth J. Grunfeld, Esq.
KOPELOWITZ OSTROW FERGUSON
WEISELBERG GILBERT

1 West Las Olas Blvd., Ste 500
Fort Lauderdale, FL 33301
Telephone: (954) 332-4200
grunfeld@kolawyers.com

Steven T. Webster, Esq. (VSB No. 31975)
WEBSTER BOOK LLP
300 N. Washington St., Suite 404
Alexandria, Virginia 22314

Telephone: (888) 987-9991
swebster@websterbook.com

Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I, David Hilton Wise, hereby certify that on June 7, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record via the ECF system.

DATED this 7th day of June, 2024.

WISE LAW FIRM PLC

By: /s/ David Hilton Wise

David Hilton Wise, VA Bar No. 30828
WISE LAW FIRM PLC
10640 Page Avenue, Suite 320
Fairfax, Virginia 22030
Telephone: 703-934-6377
dwise@wiselaw.pro